

is also a subsidiary of MEG. As the Director of Human Resources for SWECO, I monitor and serve the Human Resource functions of Jaycar. In my role, I have personal knowledge of (a) Jaycar's employment policies and practices; (b) Jaycar's payroll practices and pay rates; (c) Jaycar's employee training and employee work schedules; (d) Jaycar's equipment storage and distribution facilities; and (e) and Jaycar's employee supervision and salary procedures.

4. In my role servicing Jaycar's Human Resource functions, I am aware that Plaintiff Laron McCloud ("Plaintiff") and Robert Rios ("Rios") accepted their jobs as Plug Technicians and received job training in Midland/Odessa, Texas. Both Plaintiff and Rios worked out of the Midland/Odessa, Texas location.

5. I am also aware that employees in Midland/Odessa, Texas created McCloud's and Rios' work schedule and that they acquired the necessary equipment to perform their jobs from Defendants' facilities located in Midland/Odessa, Texas. McCloud and Rios regularly interacted with other employees and customers in Midland/Odessa, Texas and these individuals will have knowledge of Plaintiff's work schedule and hours worked.

6. Furthermore, I have knowledge that, as Plug Technicians, McCloud and Rios reported their work progress to their supervisors in Midland/Odessa, Texas each day and that Jaycar's administrative offices in Midland/Odessa, Texas process and pay Plaintiff's wages. The payroll records, work schedules, job tickets, personnel files, and other records are all maintained in Midland/Odessa, Texas. Plaintiff and Rios reported their work progress to their supervisors in Midland/Odessa, Texas each day, and they received their paychecks from Defendants' administrative offices located in Midland/Odessa, Texas.

7. Plaintiff performed work duties at the Midland/Odessa, Texas location. Plaintiff was also dispatched to various locations. Whenever a Plug Technician is dispatched to a

worksite, a job ticket is created which indicates the client and the county in which the work is being performed. I have reviewed Plaintiff's job tickets and Plaintiff was dispatched to perform services in the following counties in Texas: Midland, Upton, Glasscock, Howard, Culberson, Andrews, Martin, Ector, Reagan, Ward, Crane, Irion, Dawson, Scurry, and Loving.

8. Similarly, Rios performed work duties at the Midland/Odessa, Texas location. Rios was dispatched to perform work in the following counties in Texas: Midland, Culberson, Upton, Martin, Reagan, Glasscock, Dawson, Ector, Crockett, Howard, Scurry, and Loving.

9. Neither Plaintiff nor Rios have any job tickets indicating they were dispatched to the following counties in Texas: Atascosa, Bandera, Bexar, Comal, Dimmit, Frio, Gonzales, Guadalupe, Karnes, Kendall, Kerr, Medina, Real, or Wilson.

10. I have reviewed Plaintiff's personnel file and Plaintiff maintains a residence in Brownwood, Texas and lives in Midland, Texas during the week while working at Jaycar.

11. I have reviewed Rios's personnel file, and Rios lives in Midland, Texas.

12. Finally, Plaintiff, in May 2014, accepted a promotion to become the Shop Foreman, and since that time, he has worked on a daily basis at Jaycar's service and manufacturing facility in Midland, Texas.

I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of September, 2014.


Stephanie Aranda